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## MEMO ENDORSED

March 29, 2024

**VIA ECF**

Honorable Lewis A. Kaplan  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

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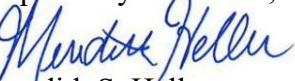
**RE: *United States v. Bashiru Ganiyu***  
**23-cr-331 (LAK)**

Dear Judge Kaplan:

This letter is submitted on behalf of my client, Mr. Bashiru Ganiyu. The deadline for Defendant's proposed voir dire and requests to charge was March 15, 2024. The deadline for opposition to motions in limine was March 22, 2024. Due to a number of factors, I have missed these deadlines. I have been dealing with two sick/injured family members and my own health concerns, including my own broken foot. Additionally, Mr. Elman has been recovering from his own surgery. However, these reasons do not excuse the failure on my part to meet the Court's deadlines or the potential harm I have caused my client. It is respectfully requested that your Honor grant me until Monday, April 1, 2024, to file the proposed documents.

The government, through A.U.S.A. Danielle Kudla, takes no position on this request.

Respectfully submitted,

  
Meredith S. Heller

Cc: A.U.S.A. Danielle Kudla (via ECF)  
A.U.S.A. Matthew Weinberg (via ECF)  
Mitchell Elman, Esq. (via ECF)

**Granted. 3/29/24**

**SO ORDERED**

  
**LEWIS A. KAPLAN, USD**